

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

Proven Industries, Inc.,

**Plaintiff**

Case No.: 1:22-cv-01342-TSE

v.

Altor Locks, LLC,

Karen Schaufeld, and,

Dylan Cato,

**Defendants.**

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**JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE**

Plaintiff Proven Industries, Inc., and Defendants Altor Locks, LLC, Karen Schaufeld, and Dylan Cato (collectively “Parties”) have agreed to resolve their disputes that are the subject of this litigation through settlement. Based on the foregoing, the Parties, by their respective counsel, stipulate to the withdrawal of Defendants’ Combined Motion to Dismiss (ECF No. 9) and, further, pursuant to Rule 41(a)(1)(A)(ii), stipulate to the dismissal with prejudice of this action, with each party bearing its own attorneys’ fees, costs and expenses.

Respectfully submitted,

/s/ Anthony Tacconi

DATED: January 11, 2023

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/s/ Lance G. Johnson

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**Attorney for Defendants Karen Schaufeld,  
Dylan Cato, and Altor Locks, LLC**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 11, 2023, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all attorneys of record. An additional copy of the foregoing was sent by electronic mail to the following individual(s) at the email address listed below:

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/s/Anthony Tacconi  
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